

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

## IN RE VALVE ANTITRUST LITIGATION

Case No. 2:21-cv-00563-JCC

**STIPULATED MOTION FOR ENTRY  
OF CASE SCHEDULE**

**NOTE ON MOTION CALENDAR:  
AUGUST 22, 2022**

The Court's August 16, 2022 Order (Dkt. # 96) instructed the parties to confer and to provide the Court with a proposed case schedule through summary judgment briefing. The parties conferred and jointly propose that the Court enter the following case schedule.

EVENT	DATE
Rolling Document Productions Begin	September 30, 2022
Substantial Completion of Transactional Data Production	March 1, 2023
Substantial Completion of Parties' Document Productions	May 1, 2023
Final Deadline for Service of Third-Party Document Subpoenas	June 30, 2023
Deadline to Amend Complaint	March 1, 2023
Close of Fact Discovery	October 31, 2023

EVENT	DATE
Deadline to (i) file Plaintiffs' Motion for Class Certification accompanied by the evidence and declarations on which Plaintiffs rely, and (ii) disclose Plaintiffs' Class Certification Expert Report(s)	December 21, 2023
Deadline to (i) file Valve's Opposition to Class Certification accompanied by the evidence and declarations on which Plaintiffs rely, (ii) disclose Valve's Class Certification Expert Report(s), and (iii) file Valve's <i>Daubert</i> Motions on Plaintiffs' Class Certification Expert(s)	April 5, 2024
Deadline to (i) file Plaintiffs' Class Certification Reply, (ii) disclose Plaintiffs' Rebuttal Class Certification Expert Report(s), (iii) file Plaintiffs' <i>Daubert</i> Oppositions, and (iv) file Plaintiffs' <i>Daubert</i> Motions on Valve's Class Certification Expert(s)	June 6, 2024
Deadline to Complete Class Certification Expert Discovery	June 24, 2024
Deadline to file Valve's <i>Daubert</i> Replies and Valve's Opposition to Plaintiffs' <i>Daubert</i> Motions	July 9, 2024
Deadline to file Plaintiffs' <i>Daubert</i> Replies	July 22, 2024
Disclose Opening Merits Expert Report(s) (on issues for which the party bears the burden of proof)	60 days after any grant of class certification
Disclose Response Merits Expert Report(s)	120 days after any grant of class certification
Disclose Rebuttal Merits Expert Report(s)	150 days after any grant of class certification
Close of Merits Expert Discovery	165 days after any grant of class certification
Last day to file Motions for Summary Judgment and <i>Daubert</i> Motions on Merits Experts	180 days after any grant of class certification
Oppositions to Motions for Summary Judgment and <i>Daubert</i> Motions	240 days after any grant of class certification <sup>1</sup>
Replies to Motions for Summary Judgment and <i>Daubert</i> Motions	270 days after any grant of class certification

<sup>1</sup> Agreed opposition and reply dates listed here apply to summary judgment motions filed 180 days after any grant of class certification. The parties agree to meet and confer regarding opposition and reply dates for any earlier filed summary judgment motion if either party believes the default opposition and/or reply dates under the Local Rules are inadequate.

1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

2 DATED this 22<sup>nd</sup> day of August, 2022.

3 s/ Alicia Cobb

4 Alicia Cobb, WSBA #48685  
5 QUINN EMANUEL URQUHART &  
6 SULLIVAN, LLP  
7 1109 First Avenue, Suite 210  
8 Seattle, Washington 98101  
9 Telephone (206) 905-7000  
10 Fax (206) 905-7100  
11 aliciacobb@quinnmanuel.com

12 Steig D. Olson (*pro hac vice*)  
13 David LeRay (*pro hac vice*)  
14 QUINN EMANUEL URQUHART &  
15 SULLIVAN, LLP  
16 51 Madison Avenue  
17 New York, New York 10010  
18 Telephone (212) 849-7231  
19 Fax (212) 849-7100  
20 steigolson@quinnmanuel.com

21 Adam Wolfson (*pro hac vice*)  
22 QUINN EMANUEL URQUHART &  
23 SULLIVAN, LLP  
24 865 S. Figueroa St., 10th Floor  
25 Los Angeles, California 90017  
26 Telephone (213) 443-3285  
Fax (213) 443-3100  
adamwolfson@quinnmanuel.com

27 Charles Stevens (*pro hac vice*)  
28 QUINN EMANUEL URQUHART &  
29 SULLIVAN, LLP  
30 50 California St., 22nd Floor  
31 San Francisco, CA 94111  
32 Telephone (415) 875-6600  
33 Fax (415) 875-6700  
34 charliestevens@quinnmanuel.com

35 *Interim Co-Lead Counsel*

36 s/ Stephanie L. Jensen

37 Stephanie L. Jensen, WSBA #42042  
38 WILSON SONSINI GOODRICH &  
39 ROSATI P.C.  
40 701 Fifth Avenue, Suite 5100  
41 Seattle, WA 98104-7036  
42 Telephone (206) 883-2500  
43 Fax (206) 883-2699  
44 sjensen@wsgr.com

45 Kenneth R. O'Rourke (*pro hac vice*)  
46 Scott A. Sher (*pro hac vice*)  
47 Allison B. Smith (*pro hac vice*)  
48 WILSON SONSINI GOODRICH &  
49 ROSATI, P.C.  
50 1700 K Street, NW, Suite 500  
51 Washington, DC 20006  
52 Telephone (202) 973-8800  
53 Fax (202) 973-8899  
54 korourke@wsgr.com  
55 ssher@wsgr.com  
56 allison.smith@wsgr.com

57 W. Joseph Bruckner (*pro hac vice*)  
58 Joseph C. Bourne (*pro hac vice*)  
59 LOCKRIDGE GRINDAL NAUEN P.L.L.P.  
60 100 Washington Avenue S, Suite 2200  
61 Minneapolis, MN 55401  
62 Telephone: (612) 339-6900  
63 Fax: (612) 339-0981  
64 wjbruckner@locklaw.com  
65 jcbourne@locklaw.com

66 *Interim Co-Lead Counsel*

1 David Golden (*pro hac vice*)  
2 CONSTANTINE CANNON LLP  
3 1001 Pennsylvania Ave., 22nd Floor  
4 Washington, D.C. 20004  
5 Telephone (202) 204-4527  
6 Fax (202) 204-3501  
7 dgolden@constantinecannon.com

8 A. Owen Glist (*pro hac vice*)  
9 Ankur Kapoor (*pro hac vice*)  
10 Jeffrey I. Shinder (*pro hac vice*)  
11 CONSTANTINE CANNON LLP  
12 335 Madison Avenue, 9th Floor  
13 New York, NY 10017  
14 Telephone (212) 350-2700  
15 Fax (212) 350-2701  
16 oglist@constantinecannon.com

17 *Interim Co-Lead Counsel*

18 Kenneth J. Rubin (*pro hac vice*)  
19 Timothy B. McGranor (*pro hac vice*)  
20 Kara M. Mundy (*pro hac vice*)  
21 VORYS, SATER, SEYMOUR AND  
PEASE LLP  
22 52 East Gay Street  
Columbus, Ohio 43215  
Telephone (614) 464-6400  
Fax (614) 719-4796  
kjrubin@vorys.com  
tbmcgranor@vorys.com  
kmmundy@vorys.com

23 Thomas N. McCormick (*pro hac vice*)  
24 VORYS, SATER, SEYMOUR AND  
PEASE LLP  
25 4675 MacArthur Court, Suite 700  
Newport Beach, California 92660  
Phone (949) 526-7903 | Fax (949) 383-2384  
tnmccormick@vorys.com

26 *Interim Executive Committee Member*

s/ Gavin W. Skok

Gavin W. Skok, WSBA #29766  
FOX ROTHSCHILD LLP  
1001 Fourth Avenue, Suite 4400  
Seattle, WA 98154  
Telephone: (206) 624-3600  
Fax: (206) 389-1708  
gskok@foxrothschild.com

Kristen Ward Broz  
FOX ROTHSCHILD LLP  
2020 K. St. NW, Ste. 500  
Washington, DC 20006  
Telephone (202) 794-1220  
Fax (202) 461-3102  
kbroz@foxrothschild.com

Charles B. Casper (*pro hac vice*)  
MONTGOMERY McCACKEN WALKER  
& RHOADS LLP  
1735 Market Street, 21st Floor  
Philadelphia, PA 19103  
Telephone (215) 772-1500  
ccasper@mmwr.com

*Attorneys for Defendant Valve Corporation*

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Honorable John C. Coughenour  
United States District Court Judge